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15 *Counsel for Creditors MassMutual Life*
16 *Insurance Company and Its Funds*

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION; PACIFIC GAS
AND ELECTRIC COMPANY,

Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)
(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST
FOR NOTICES AND SERVICE OF PAPERS

PLEASE TAKE NOTICE that pursuant to § 1109(b) of the United States
Bankruptcy Code and Rules 2002 and 9010(b) of the Bankruptcy Rules, the attorneys listed below
hereby appear as counsel to Creditors MassMutual Life Insurance Company, MM S&P 500® Index
Fund, MM Select Equity Asset Fund, MassMutual Select BlackRock Global Allocation Fund,
MassMutual Select Diversified Value Fund, MassMutual Select Equity Opportunities Fund,
MassMutual Select Mid-Cap Value Fund, MassMutual Select T. Rowe Price Large Cap Blend Fund,
MassMutual Select T. Rowe Price Small and Mid Cap Blend Fund, MassMutual Premier Balanced

1 Fund, MassMutual Premier Disciplined Value Fund, MassMutual Premier Main Street Fund, MML
2 Blend Fund, MML Equity Fund, MML Equity Income Fund, MML Equity Index Fund, MML
3 Income & Growth Fund, MML Managed Volatility Fund, MML Mid Cap Value Fund, MassMutual
4 Select Strategic Bond Fund, MassMutual Premier Balanced Fund, MassMutual Premier Diversified
5 Bond Fund and MML Dynamic Bond Fund (the “Creditors”) in the above-captioned chapter 11 case¹
6 and request that copies of any and all notices, pleadings, motions, orders to show cause, applications,
7 petitions, memoranda, affidavits, declarations, orders, disclosure statement(s) and plan(s) of
8 reorganization, or other documents filed or entered in this case be transmitted to:

9
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17 **PLEASE TAKE FURTHER NOTICE** the Creditors do not intend, nor shall it be deemed,
18 through this Notice of Appearance and Request for Notices and Service Of Papers, or any subsequent
19 appearance, pleading, claim, suit, or conduct, to waive any substantive or procedural rights,
20 including, without limitation, (i) the right to have a United States District Judge determine de novo
21 all non-core proceedings (and all core proceedings as to which the Bankruptcy Court lacks authority
22 to enter judgments or final orders), (ii) the right to a trial by jury in any proceeding so triable in this
23 case or any case, controversy, or proceeding related to this case, (iii) the right to have the United
24 States District Court withdraw the reference in any matter subject to mandatory or discretionary
25 withdrawal, (iv) any right to object to the jurisdiction of the Bankruptcy Court, or to venue in the
26 Norther District of California, for any purpose other than with respect to this Notice of Appearance
27 and Request for Notices and Service Of Papers, or (v) any other rights, claims, actions, defenses,

28 ¹ Goodwin Procter LLP files this Notice of Amended Appearance on behalf of the Creditors as defined herein, as necessitated by the departure of its counsel Nathan A. Schultz from Goodwin Procter LLP effective close of business on May 7, 2021.

1 setoffs, recoupments, or remedies to which it is or may be entitled under agreements, in law or in
2 equity, all of which rights, claims, actions, defenses, setoffs, recoupments, and remedies the
3 Creditors expressly reserve.

4 Dated: May 7, 2021

Respectfully submitted,

GOODWIN PROCTER LLP

6 By: /s/Rachel M. Walsh
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11 *Counsel for Creditors MassMutual Life Insurance*
12 *Company and Its Funds*

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I certify under penalty of perjury that the foregoing is true and correct. Executed on May 7, 2021.

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